



Office of the Mayor

November 10, 2017

Ms. Barbara Alfano, Brownfields Coordinator Environmental Protection Agency Region 4 Atlanta Federal Center 61 Forsyth Street, S.W., 10th Floor Atlanta, GA 30303-8960

Re: City of Greenville, South Carolina

FY 2018 EPA Brownfields Community-Wide Assessment Grant Proposal

Dear Ms. Alfano:

The City of Greenville is pleased to submit an application for consideration for a FY2018 Environmental Protection Agency (EPA) Community-Wide Assessment Grant. Funds from this grant program will be used to assess properties potentially contaminated by hazardous substances and petroleum throughout the City's Reedy River Redevelopment Area (RRRA)—a roughly 350-acre planning area that encompasses much of the City's west side. After decades of idling amongst abandoned and rundown manufacturing buildings, textile facilities, and old service stations, the RRRA is slowly entering an era of revitalization. As development emanating from Greenville's downtown pushes westward and the City completes major projects to encourage the area's renaissance—like the recent relocation of its Public Works Operations Center to free the property for a regional park—the need to protect and promote equitable development for the area's low-income residents becomes increasingly pressing. To that end, this grant project, which will strive to incorporate authentic community engagement while clearing some of the RRRA's properties for equitable uses such as park land or future affordable and workforce housing developments, is critical.

The following information is provided per the guidelines.

a. Applicant Identification: City of Greenville, South Carolina 206 South Main Street

Greenville, SC 29601-2832

b. Funding Requested:

i). Grant type: Assessment

ii). Assessment Grant Type: Community-wide

iii). Federal Funds Requested: \$300,000. A waiver request is not applicable. iv). Contamination: \$200,000 for hazardous substances; \$100,000 for petroleum



Office of the Mayor

c. Location: City of Greenville, Greenville County, South Carolina

d. Not applicable

e. Contacts:

i). Project Director:

Monique Mattison, Community Planner

Phone: 864-467-4574

Email: mmattison@greenvillesc.gov Mailing Address: City of Greenville

P.O. Box 2207

Greenville, SC 29602

ii). Chief Executive/Highest Ranking Official:

Honorable Knox H. White, Mayor

Phone: 864-467-4590

Email: kwhite@greenvillesc.gov Mailing Address: City of Greenville

P.O. Box 2207

Greenville, SC 29602

f. Population:

i). City of Greenville – 61,734 (2011-2015 American Community Survey data)

ii). Not applicable

iii). No, the City of Greenville is not located within a county (nor does the City's jurisdiction include a county) experiencing "persistent poverty" where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.

g. Regional Priorities Form/Other Factors Checklist: Attached

h. Letter from the State Environmental Authority:

A letter from Ms. Daphne Neel, Chief for the South Carolina Department of Health and Environmental Control's Bureau of Land and Waste Management, acknowledging the State's awareness and support of the City's grant application is attached.

Thank you for your time and consideration. If you have any questions, please feel free to contact me at (864) 467-4590.

Sincerely,

Knox H. White

Mayor

Appendix 3 - Regional Priorities Form/Other Factors Checklist

| Name of Applicant: | _City of Greenville, South Carolina | |
|--------------------|-------------------------------------|--|
| * * | | |

Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

| Regional Priority Title(s): | |
|---|---|
| Region 4: Assistance to Communities That Have Limited In-House Capacity to Manage | |
| Brownfield Projects | |
| Page Number(s): _5_ | |
| E | _ |

Assessment Other Factors Checklist

Please identify (with an x) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

| Other Factor | Page # |
|--|--------|
| None of the Other Factors are applicable. | |
| Community population is 10,000 or less. | 1, 2 |
| The jurisdiction is located within, or includes, a county experiencing "persistent | |
| poverty" where 20% or more of its population has lived in poverty over the past | |
| 30 years, as measured by the 1990 and 2000 decennial censuses and the most | |
| recent Small Area Income and Poverty Estimates. | |
| Applicant is, or will assist, a federally recognized Indian tribe or United States | |
| territory. | |
| Target brownfield sites are impacted by mine-scarred land. | |
| Project is primarily focusing on Phase II assessments. | |
| Applicant demonstrates firm leveraging commitments for facilitating brownfield | 9 |
| project completion, by identifying in the proposal the amounts and contributors | |
| of resources and including documentation that ties directly to the project. | |
| Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant. | |



November 10, 2017

Barbara Alfano Region 4 Brownfields Coordinator United States Environmental Protection Agency Resource Conservation and Restoration Division 61 Forsyth Street SW Atlanta, Georgia 30303-8960

RE: EPA Brownfields Community-wide Assessment Grant

City of Greenville, South Carolina

Dear Ms. Alfano:

The South Carolina Department of Health and Environmental Control, the State's environmental authority, acknowledges and fully supports the City of Greenville's Community-wide Brownfields Assessment Grant application with a focus on the West Side of Greenville including the West Greenville, West End and Southernside neighborhoods and the footprint of the new City Park.

We support the City's efforts to identify properties for cleanup and redevelopment to benefit the community. If the grant is awarded, the Department will provide technical assistance to the City as it works to cleanup and redevelop Brownfields sites in their community.

The Department appreciates your consideration of the application, and hopes for a favorable outcome. Your positive response will assist the City in ongoing efforts to revitalize several communities on Greenville's west side. These neighborhoods are the subject of a Partnership for Sustainable Communities grant project, called Connections for Sustainability. A successful Brownfields grant application would enable the City to continue the ongoing work to address blighted and vacant properties in these economically depressed neighborhoods. Please contact my staff with any questions; Robert Hodges is the manager of our Brownfields Program, and he can be reached at (803) 898-0919.

Sincerely,

Daphne Neel, Chief

Bureau of Land and Waste Management

Japhne Meel

cc: Natalie Kirkpatrick, Upstate EA Greenville

Robert Hodges, Manager, Brownfields Program

Narrative Proposal/Ranking Criteria for Community-Wide Assessment Grants

1. Community Need

1.a. Target Area and Brownfields

i) Community/Target Area Description: Located in the northwestern corner of South Carolina, Greenville regularly earns top-billing as one of the nation's best places to live and do business mostly due to its flourishing downtown that hosts 3.5 million square feet of office space, a multitude of shops and restaurants, museums, and ample outdoor space. Slightly west of downtown is the West Side—an area that encompasses three minority and economically-disadvantaged neighborhoods and the majority of the city's brownfields—many of which are the hulking remains of old textile mills and facilities.

In 1920, 16 cotton mills and two dye and bleaching mills formed a semi-circle throughout Greenville's West Side. The industry weathered the Great Depression, experienced a resurgence after World War II, and, by 1960, had earned Greenville the title of "Textile Capital of the World." In addition to serving as the community's economic lifeblood, the textile industry and the mill villages that surrounded each facility created a lasting imprint on the city's layout. More than 2,000 homes housed the mills' workforce and many still stand in the neighborhoods that makeup the West Side today. Unfortunately, in the 1970s cheaper labor overseas, international trade agreements, and the failure to modernize, eroded the industry's market stronghold. As the mills closed, leaving vast facilities and environmental concerns in their wake, the West Side and the city suffered. Businesses were shuttered or razed, people left in droves in search of employment elsewhere, and the mills' workforce housing deteriorated.

In the late 1970s, a concentrated effort by community leaders to revitalize downtown forged separate futures for Greenville's urban core and the West Side. As a series of planning efforts and significant public and private reinvestment revitalized Greenville's Main Street, less than three miles away the West Side languished amongst its blighted textile facilities. Manufacturers of soft drinks and other consumables, as well as a plethora of auto repair shops and service stations sprang up in the West Side but were unable to fill the void from the textile industry's flight.

Thirty-seven years later, Greenville's vibrant downtown is booming, while the West Side is just beginning to experience the successes that initiated Main Street's revival. For example, catalytic developments atop former brownfields (and stimulated by previous EPA Brownfields Assessments), like the Salvation Army's Ray and Joan Kroc Community Center (Kroc Center)—a family support, education, recreation, and cultural arts facility—and A.J. Whittenberg (AJW) Elementary School are improving the quality of life for West Side residents while attracting new development. New community planning efforts also have been completed, including the identification and strategic planning of the Reedy River Redevelopment Area (RRRA), a roughly 350-acre planning area that envelopes much of the West Side and includes plans for a new regional City Park. Other galvanizing factors include downtown's skyrocketing growth, which is steadily advancing westward, and the permanent closure of the City's West Side-based Public Works Operations Center in December 2017 to make way for the City Park. Assessing brownfields throughout the RRRA, this project's target area, will considerably advance the area's current pace of redevelopment while ensuring new development is equitable for all residents.

ii) Demographic Information/Indicators of Need: Not surprisingly, given its nearly forty-year moribund status post textile industry flight, the RRRA's residents are facing a multitude of economic hardships. There are 4,576 people residents living in the RRRA, **making it a target**

micro-community with a population of 10,000 or less. More than 78% of residents are considered a minority (predominantly Black) and the average per capita income is \$13,263, more than \$17,700 below that of the city. These demographics, especially when combined with the area's brownfields, raise strong environmental justice concerns. Other sharp differences in economic prosperity between the RRRA and the rest of the city, shown in the table below, include: a poverty rate that is more than double that of the city; a high percentage of households receiving SNAP benefits (food assistance); a considerably higher unemployment rate; and a worrisome rate (51.9%) of families with children living in poverty. RRRA residents also are much less likely to own their homes, with an average 73% rental home rate contrasted to 57.6% in the city. RRRA home values also are alarmingly low—more than \$122,000 below that of the city.

| Demographic | Reedy R | iver Redev Area | elopment | City of Greenville | South Carolina | National |
|------------------------------------|----------|--------------------|-----------|-----------------------|-------------------|-------------|
| | Census | Census | Census | | | |
| | Tract 7 | Tract 8 | Tract 9 | | | |
| Population | 1,981 | 1,308 | 1,287 | 61,734 | 4,777,576 | 316,515,021 |
| % Minority | 75.8% | 86.4% | 73% | 37.6% | 36.1% | 37.8% |
| % African-American | 65.9% | 81.0% | 70.4% | 28.8% | 27.5% | 12.6% |
| % Hispanic | 5.8% | 4.7% | 2.8% | 5.1% | 5.3% | 17.1% |
| % children (under 5) | 3.7% | 7.3% | 6.4% | 5.8% | 6.1% | 6.3% |
| % females of childbearing age (15- | 38.7% | 41.9% | 37.6% | 46.4% | 38.2% | 39.3% |
| 44 to align with ACS age ranges) | | | | | | |
| % elderly (65+) | 14.2% | 7.9% | 9.6% | 12.0% | 15.2% | 14.1% |
| Unemployment | 12% | 9.2% | 13.1% | 5.9% | 5.7% | 5.0% |
| Poverty Rate | 45% | 54.3% | 47.8% | 19.3% | 17.9% | 15.5% |
| % families w/children below | 53.8% | 53.4% | 48.5% | 23.5% | 22.0% | 18.0% |
| poverty | | | | | | |
| Per Capita Income | \$14,053 | \$8,876 | \$16,861 | \$31,015 | \$24,604 | \$28,930 |
| Median Household Income | \$20,938 | \$14,491 | \$16,958 | \$41,924 | \$45,483 | \$53,889 |
| Median Home Value | \$83,700 | \$57,500 | \$155,600 | \$221,800 | \$139,900 | \$178,600 |
| % Rental Homes | 66.7% | 78.3% | 74.0% | 57.6% | 31.4% | 36.1% |
| % w/SNAP benefits in past 12 | 32.2% | 41.9% | 37.5% | 13.8% | 15.1% | 13.2% |
| months | | | | | | |

Sources: 2011-15 American Community Survey (ACS) 5-Year Estimates (factfinder.census.gov, accessed October 2017)

Other 2011-2015 ACS Estimates illustrate additional socioeconomic challenges in the RRRA. The RRRA population is aging—more than 14% of residents are between the ages of 55 and 64 and almost 30% are between the ages of 45 and 64. As these groups age in place, the RRRA's senior population (age 65+), and a population particularly sensitive to the presence of brownfields, will grow. Educational attainment is poor; 23.4% of the population entered grades 9th to 12th but received no diploma compared to 8.2% citywide. Assessing and redeveloping the area's brownfields will help: address real and perceived environmental issues (discussed in section 1.b.ii) which may negatively impact sensitive populations, like elderly and women of childbearing age; bring new businesses and services to the area thereby providing more job opportunities; and bring more schools to the area (like AJW Elementary).

iii) Description of Brownfields: The RRRA's brownfields range in size from small (<1 acre) to large (>20 acres) and include sites that were former gas/service stations, dry cleaners, railroad sites, and textile and textile support facilities. Many of these sites are abandoned and run-down which only intensifies negative perceptions about the area's environmental concerns. These sites are interspersed amongst the area's neighborhoods (as mentioned in section 1.a.i workforce housing for the textile mills, which is still in use today, typically flanked the facility) and

commercial corridors. Potential contamination ranges from lead and polychlorinated biphenyls (PCBs) connected to the area's textile past to complex mixtures of volatile organic compounds from gas stations that were deserted well before environmental best practices were standard. Moreover, reports from local environmental groups (including project partner Upstate Forever) claim during the textile industry's heyday, the Reedy River's waters ran the color of dye that was dumped into it daily. As such, past flooding events could have dispersed a number of adverse contaminants throughout the RRRA's neighborhoods. One site for which this is a chief concern is a 4.5-acre site situated in the river's floodway and south of a row of warehouses. This site is slated to become City Park's Great Lawn, an open gathering space that is expected to be well-used given its proximity to a planned visitor's center, playgrounds, and concert stage. Remediating perceived and actual environmental concerns on this site is a necessity before this gateway feature of City Park can be constructed.

1.b. Welfare, Environmental, and Public Health Impacts

- i) Welfare Impacts: Brownfields impacts on the RRRA community's welfare are pervasive. According to the United States Department of Agriculture's Food Access Research Atlas, all three of the RRRA's census tracts have low access to healthy and affordable food, and tracts 7 and 8 have extremely high percentages of residents who are low-income and living more than one mile from a supermarket—42.4% and 59.9% respectively—compared to the county's 10.5%. This could be the result of developers' reluctance to undertake new projects in an area perceived to have environmental risk. Vacant and rundown properties also are known magnets for crime. The Greenville Police Department creates annual major crimes hot spot maps detailing sections of the city where major crimes, such as robberies or aggravated assaults, are most prevalent. West Greenville, one of the RRRA's neighborhoods, consistently appears on those maps. These dilapidated sites also are impediments to some of the area's amenities. An impact study completed in June 2013 on the Swamp Rabbit Trail (SRT), the nearly 20-mile-long greenway that runs through the heart of the RRRA and connects to Greenville's downtown, indicates low usage from surrounding neighborhoods. According to the study, this trail is accessed by more than 501,000 users annually and just under 10% of trail users are minorities. Since 78% of the RRRA's population are a minority, this suggests barriers like brownfields may prevent residents from accessing and using the trail. As the City starts to build the RRRA's City Park on the site of its former Public Works Operations Center and adjacent to the SRT, addressing these brownfields barriers will become increasingly important so residents can safely connect to these amenities. A severe affordable rental housing deficit that is impacting the entire city is also affecting the RRRA. An affordable housing study conducted by czb for the City in 2016 reports that as recently as 2000 Greenville had an excess of low-cost rentals (\$500/month in today's dollar); today, Greenville is short by 2,500 such units. As the City corrects this shortage by working with developers to locate affordable housing developments citywide, using brownfields assessments to identify suitable locations and alleviate developers' environmental concerns in the RRRA will benefit its residents, especially given the area's high poverty and rental rates.
- **ii)** Cumulative Environmental Issues: Other environmental concerns in the RRRA include: a very active Norfolk Southern and CSX railways intermodal transfer center, Amtrak Station, and rail line that spans the project area's northern portion; the presence of the Reynolds Company, a manufacturer of water-based, hot-melt and dry-blended adhesives; and the City's 27.67-acre Public Works Operations Center. In use since the 1960s, the Operations Center houses most of the City's fleet and vehicle maintenance services. Though the Center's relocation will be complete in December 2017, the facility is likely to have had environmental impacts on the site

that will need to be mitigated by the City, in addition to site demolition. The RRRA's neighborhoods have been saddled with the air emissions, chemical releases, dust, stormwater runoff (160 acres of the RRRA's 350-acre planning area sits in the Reedy River's flood zone), and noise pollution from each of these facilities for more than 50 years, not including the rail lines which date back to the mid-1850s. Not surprisingly, given these cumulative environmental concerns, per the EPA's Environmental Justice Screening and Mapping Tool (EJSCREEN) (accessed October 2017), the RRRA's census block groups are prone to above State average amounts of particulate matter, ozone, and diesel particulate matter. Traffic proximity and volume (daily traffic count/distance to road) is also abnormally high for the area—one census block group in Tract 7 reported a value of 270 compared to the State's 53.

iii) Cumulative Public Health Impacts: The cumulative public health impacts arising from the RRRA's brownfields and the facilities discussed above are numerous and can be linked to chemical stressors, like increased amounts of particulate matter in the air, and non-chemical stressors, such as living in poverty. Past Environmental Site Assessments (ESAs) conducted in the RRRA found elevated levels of lead, polychlorinated biphenyls (PCBs), and volatile and semi-volatile organic compounds—contaminants indicative of the area's textile history, according to an EPA Report titled "Revitalizing America's Mills: A Report on Brownfields Mill Projects." Both the EPA and the International Agency for Research on Cancer have determined that PCBs are carcinogenic. According to a 2016 Community Health Needs Assessment (CHNA) performed by the local Bon Secours St. Francis Health System, the leading cause of death in Greenville County is cancer, followed by heart disease, and then chronic lower respiratory disease. The CHNA also reported African Americans have higher death rates due to cancer than other groups—a potential concern for the RRRA's 78% minority population. The EJSCREEN reports mentioned above also indicate the cancer risk and respiratory hazard index is higher in the RRRA than the rest of the State which corroborates the CHNA's findings.

Exacerbating these negative chemical stressors are the area's non-chemical stressors linked to the area's disproportionate number of brownfields. According to the Centers for Disease Control and Prevention these stressors, or conditions, are known as social determinants of health (SDOH), and the differences in health are striking in communities like the RRRA with poor SDOH such as unstable housing, low-income, and unsafe neighborhoods. Echoing this information, the CHNA lists limited or no access to safe places to live and exercise, poor nutrition, and food insecurity as substantial issues for Greenville County residents. For example, 14.4% of households have at least one of the following housing problems: overcrowding, high housing costs, lack of kitchen, or lack of plumbing facilities. In Greenville County, 28.5% of adults are obese and 23.4% are sedentary. Aggravating this finding is the fact that RRRA residents have substantially lower access to park and exercise space—only 10.8 acres compared to 145 acres in Nicholtown (another city neighborhood with a low average median income (\$23,598) and majority Black population (80.4%) but is unburdened by brownfields).

Whether it is exposure to PCBs and the possible risk for cancer or poor mental health associated with the stress of balancing high housing costs with grocery bills, the RRRA's residents—nearly all of whom can be considered a sensitive population given the area's high poverty rate (49%), growing number of elderly, and notable percentage (39.4) of women of childbearing age—are shouldering these threats daily. Assessing and clearing the RRRA's properties for affordable housing, recreational space, or grocery stores is vital to addressing residents' exposure to chemical and non-chemical stressors.

1.c. Financial Need

- i) Economic Conditions: In the years immediately following the economic crisis, the City was fortunate to sustain its level and quality of service and staff without raising taxes primarily by making capital project compromises. Now, the City is addressing deferred capital costs, such as the recent opening of a new fire station, alongside the RRRA's major financial strains like the relocation of the Public Works Operation Center (a \$25 million endeavor) and the RRRA/City Park planning process (\$573,000). As the City makes these investments in the RRRA, which are simultaneously striving to realize the RRRA's revitalization and protect the needs of the area's long-time residents, Brownfields Assessment funding, with its similarly aligned goals, is critical to that process for two key reasons. First, the neighborhoods that comprise the RRRA lack the capacity to manage a brownfields project. Without staff and financial and programmatic protocols, they fully rely on the City to operate a brownfields program that benefits the area. Furthermore, given the area's strikingly low incomes, the residents are financially unable to prompt their own community investment and brownfields redevelopment. Secondly, while the City strives to help its RRRA residents, it is enduring continual cutbacks from other equitable development funding allocations. Since Fiscal Year 2010, the City's funding allocations for Community Development Block Grant (CDBG) and HOME Investment Partnership have decreased by 36% and 48% respectively, which translates into an annual reduction of \$636,597.
- ii) Economic Effects of Brownfields: The RRRA's adverse economic effects are most apparent in the area's depressed property values and small number of City-issued business licenses. As first described in section 1.a.ii, home values in the RRRA average \$98,933—well below the city average of \$221,800. This is likely related to the area's dilapidated conditions, like nearby brownfields, the multitude of substandard rental housing that supports the area's 73% renter population, and higher rate, 14.9%, of vacant homes versus the city's 12.5%. Other property owners have little incentive for upkeep when the property next-door is run-down or abandoned, resulting in widespread blight. When severe property code issues arise, these decrepit properties require demolition which burdens City services. From July 2015 to June 2017 more than 40% of the City's residential demolitions took place in or near the RRRA at a cost to the City of \$90,256. As shown in the table below, the RRRA accounts for a very low number of City-issued business licenses and economic activity (total gross receipts) especially when compared to the nearby and smaller downtown area. The contrast may be indicative of business owners' hesitancy to locate in the brownfield-laden RRRA, which in turn stifles any local job creation that could improve average median household income (\$17,462) and the area's high unemployment rate (11.4%).

| Area | # of business licenses issued from | Total gross receipts of licensed |
|---------------------|------------------------------------|--------------------------------------|
| | 2011-2016 | businesses from 2011-2016 |
| RRRA | 1,171 | \$1,141,719,603 |
| Downtown (Main St.) | 4,750 | \$6,591,275,838 |
| Difference | RRRA has 75% fewer businesses. | RRRA has 83% less in gross receipts. |

Source: City of Greenville Revenue and Business License Division

2. Project Description and Feasibility of Success

2.a. Project Description, Redevelopment Strategy, and Timing and Implementation i) Project Description/Alignment with Revitalization Plans: The RRRA's poor economic conditions, which range from a high poverty rate amongst its residents to a meager number of local businesses, are undoubtedly tied to the area's glut of dilapidated properties and brownfields. To help the area overcome the economic, environmental, and social barriers connected to its brownfields, this Assessment project will conduct Phase I and II Environmental Site Assessments

(ESAs) on sites within the RRRA suspected or known to have hazardous substances and petroleum contamination and develop viable cleanup/redevelopment planning activities for those sites. Significant community involvement from residents and other community stakeholders will drive the site selection process for ESAs as well as redevelopment planning to ensure that the RRRA's majority low-income and minority population both participates in and benefits from project decisions and outcomes.

This project aligns with and catalyzes two recent RRRA community planning efforts. In 2014, the West Side Comprehensive Plan (WSCP) used an extensive public outreach process to create policy, development, infrastructure, and site-specific recommendations for the RRRA. Many of the WSCP's land use recommendations, such as constructing City Park and building trail spurs to connect neighborhoods to the area's popular Swamp Rabbit Trail (SRT), align with this project. In 2016, the RRRA underwent a Strategic/City Park planning initiative. This initiative identified the boundaries of the RRRA (350 acres encompassing three West Side neighborhoods) and City Park (60 acres along the Reedy River). The main objectives included: laying the foundation for repurposing the City's Public Works Operation Center into park space, guaranteeing equitable development throughout the RRRA (this was reinforced with widespread community participation in the planning process and was the impetus for the affordable housing study conducted in 2016 and referenced in section 1.b.i), and protecting the Reedy River and its floodplain. Without brownfields assessments to encourage the redevelopment envisioned by the community in these two plans, not to mention the redevelopment activities generated through this project, the RRRA's transformation from an economically- and environmentally-challenged community to a vibrant one is at risk. Moreover, the enhanced benefits anticipated from positioning the RRRA's brownfields for redevelopment (as described in sections 4.a and 4.b) may be delayed or never fully realized. This project also advances a FY 2018-2019 EPA Agency Priority Goal as identified in the draft FY 2018-2022 Strategic Plan—"make additional brownfield sites ready for anticipated use." Conducting ESAs on community-identified priority brownfield sites in the RRRA will position these sites for new uses that will create equitable and sustainable development and deliver enhanced community benefits—like a marketplace and community gardens in City Park—to improve residents' access to healthy and affordable food.

This project also underpins sustainable practices in the RRRA, a precedent that was set when AJW Elementary (built atop a former RRRA brownfield) was constructed to silver Leadership in Energy and Environmental Design (LEED) status. Sustainable practices, like filtering runoff to improve water quality, floodplain restoration, and the use of energy efficient lighting will be integrated into City Park's operations to achieve Sustainable SITES Initiative certification. Therefore, assessments conducted through this project not only will support sustainability practices but will help encourage the incorporation of such practices into other area redevelopment projects. This project's dual commitment to fostering and incorporating meaningful community involvement (described in more detail in section 3.a.i) and reducing the impacts of brownfields in the overburdened RRRA community also supports environmental justice.

ii) Redevelopment Strategy: The redevelopment strategy for the properties assessed under this grant will draw on the RRRA's recent planning efforts—the WSCP and Strategic/City Park Plans—as well as community input captured through the involvement plan described in section 3.a.i. The planning efforts will strengthen the redevelopment strategy since those efforts used considerable community feedback to envision new uses for some of the RRRA's brownfields. For example, community input has called for the restoration of wetlands near a row of

warehouses as part of City Park. Renewed community input under this grant project will ensure assessment and redevelopment activities are responsive to the community's current needs. The extent to which existing infrastructure in the RRRA can be enhanced or used to support potential redevelopment also will be integrated into the strategy. The City recently completed a series of assessments and inventories on RRRA infrastructure that will directly assist with this component. For example, existing transit routes and stops were assessed for condition and compliance with ADA standards; information on existing stormwater and sanitary sewer systems was analyzed; and pedestrian circulation systems such as sidewalks and trails were inventoried and assessed. Other infrastructure assessments underway include identifying existing overhead utilities by type and determining key recreational and cultural amenities. These various inventories and assessments will ensure as redevelopment is activated by this project it is either adequately supported by existing infrastructure or, where known inadequacies exist, improvement plans are in place to complement the redevelopment activity.

iii) Timing and Implementation:

- (a) Contractor procurement: The City has procurement procedures in place that comply with 40 CFR 31.36 and facilitate efficiency for selecting contractors. To maximize the three-year project timeframe, the project team, in conjunction with the Office of Management and Budget, will prepare a Request For Proposals for a qualified brownfields consultant that will be released when the EPA makes grant announcements in spring 2018. Other internal steps for contractor procurement include: advertising the RFP for a minimum of 30 days; evaluating and scoring RFPs; and awarding and negotiating the contract. It typically takes less than ten weeks to complete this process, as such the consultant will be in place when the project begins on October 1, 2018.
- (b) Site inventory and prioritization process: A tentative list of priority sites has been generated in conjunction with community stakeholders and as part of the RRRA's recent planning efforts, the WSCP and Strategic/City Park Plans. Once the project is underway, the site inventory will be developed further using the Brownfields Task Force (Task Force). Comprised of community stakeholders, including RRRA residents, the Task Force will act in an advisory capacity for the project (role is described further in section 3.a.i). The Task Force also will be responsible for establishing the criteria for site prioritization which is likely to factor in: real or perceived environmental issues; likelihood that immediate redevelopment plans consistent with community goals—especially the creation of open space and equitable development—will occur; the involvement of a willing seller and financially-viable buyer; and the potential to leverage private investment. The potential for job creation, provision of community services and goods, and enhancement of quality of life also are likely considerations.
- (c) Obtaining and securing site access: The City has started a RRRA Land Bank which is currently comprised of 50 acres (24 acres for park area/26 acres for redevelopment opportunities). Some of the potential priority sites are in the Land Bank, meaning as the property owner the City can guarantee immediate access to these sites. As the City acquires additional property in the area for the Land Bank (and to the extent these properties are considered a priority for this project), it will require site access for assessment as part of the acquisition process. To gain access to any privately-owned sites, the City will meet one-on-one with property owners to discuss the value of participating. To generate interest amongst property owners in the RRRA, presentations and resources will be shared with local brokers, developers, attorneys, lenders, and design professionals as well via Quarterly Real Estate breakfasts (hosted by the City). The City has successfully used these methods to secure site access from private property owners in the past.

However, should a property owner refuse to participate, the City will simply redirect its efforts to the next priority site, especially since there is not a scarcity of properties in need of assessment given the number of sites identified through recent planning efforts, input from stakeholders, and the City's own work acquiring land for the Land Bank.

2.b. Task Descriptions and Budget Table

i) Task Descriptions: Greenville is requesting \$200,000 to assess RRRA properties with possible hazardous substance contamination and \$100,000 for properties with possible petroleum contamination. Funding will be used to conduct community outreach, Phase I/II ESAs, and cleanup/ redevelopment planning activities. The City has an interdepartmental team, including a dedicated project director, in place to manage the project, and per section 2.a.iii (a) will hire an experienced brownfield consultant (labeled as contractor in the budget table) to provide additional programmatic and technical support. Project costs were estimated using costs the City incurred during its 2014 Community-Wide Assessment Grant and verified with industry partners.

Task 1 - Community Engagement and Outreach activities include: holding meetings with local residents; updating project brochure and website; offering Brownfields Lunch and Learn Series (two/year); maintaining opt-in monthly electronic newsletter; producing social media updates; meeting with prospective buyers/developers and property owners; attending relevant meetings, workshops and conferences sponsored by the EPA and/or the South Carolina Department of Health and Environmental Control (SCDHEC); developing brownfields lesson plan for Carolina High School (located near RRRA) students; offering 6 educational pop-up events; and convening the Brownfields Redevelopment Task Force (Task Force) which will meet quarterly for a total of 12 meetings. Funds allocated for this task total \$30,000 (Hazardous-\$20,500, Petroleum-\$9,500) and include: personnel expenses (\$14,000) to fund a portion of the project director's salary to implement all task activities listed above; travel expenses (\$14,000) for relevant workshop/conference attendance; and supplies (\$2,000) for software, printing, and outreach materials.

Task 2 - Phase I and II ESAs will be performed (by a qualified brownfields consultant in accordance with the All Appropriate Inquiries regulation) on sites prioritized by the Task Force. The following activities will be completed by the brownfields consultant with oversight by the City: 14 hazardous and 10 petroleum Phase I ESAs will be conducted in accordance with ASTM E1527-13 at an estimated cost of \$2,500 per assessment depending on property size and site complexity; and 3 hazardous (at a cost of \$35,000 each) and 2 petroleum (at a cost of \$20,000) Phase II ESAs in accordance with ASTM E1903-11. Phase II ESA costs may vary according to property size, site complexity, and degree of contamination. The consultant also will complete: site-specific Quality Assurance Project Plans, Health & Safety Plans, Historic Properties or Threatened and Endangered Species Surveys, asbestos-containing material and lead-based paint surveys, and provide assistance in negotiating Voluntary Cleanup Contracts/Brownfields Agreements with SCDHEC as needed. These costs are factored into the price for Phase II ESAs. Funds allocated for this task total \$225,000 (Hazardous-\$153,125, Petroleum-\$71,875) and are distributed amongst: contractual expenses (\$205,000) for brownfields consultant; and personnel expenses (\$20,000) to fund a portion of the project director's salary for consultant oversight.

<u>Task 3 - Cleanup/Redevelopment Planning</u> will be guided by community input and completed by the consultant with oversight by the City. Cleanup activities include calculating cleanup costs and determining the best way to proceed with redeveloping the properties. This information will be summarized in an Analysis of Brownfields Cleanup Alternatives (ABCA). The City anticipates developing 4 ABCAs over the course of the project (2 hazardous/2 petroleum) at a cost of

approximately \$3,000 per document. Redevelopment will consider community input, recent planning efforts, desired end use and environmental contamination issues; it will include meetings with the impacted communities and with prospective purchasers, developers and lenders. <u>Funds allocated for this task total \$45,000 (Hazardous-\$26,375, Petroleum-\$18,625)</u> and include: <u>contractual expenses (\$12,000)</u> for brownfields consultant; and <u>personnel</u> expenses (\$33,000) to fund a portion of the project director's salary for consultant oversight.

In addition to these activities, the project director will update the Assessment, Cleanup and Redevelopment Exchange System (ACRES) and oversee all other grant performance and financial reporting. The City's in-kind commitment of \$103,473 will fund this activity.

ii) Budget Table:

| Budget Categories | Task 1-Outreach | Task 2-ESAs | Task 3-Redevelopment | Total |
|-------------------|----------------------|-------------|----------------------|-----------|
| | Hazardous Substances | | | |
| Personnel | \$5,535 | \$6,785 | \$11,000 | \$23,320 |
| Fringe Benefits | \$4,965 | \$6,340 | \$9,375 | \$20,680 |
| Travel | \$9,500 | \$0 | \$0 | \$9,500 |
| Supplies | \$500 | \$0 | \$0 | \$500 |
| Contractual | \$0 | \$140,000 | \$6,000 | \$146,000 |
| Total | \$20,500 | \$153,125 | \$26,375 | \$200,000 |
| | Petroleum | | | |
| Personnel | \$1,730 | \$3,730 | \$6,700 | \$12,160 |
| Fringe Benefits | \$1,770 | \$3,145 | \$5,925 | \$10,840 |
| Travel | \$4,500 | \$0 | \$0 | \$4,500 |
| Supplies | \$1,500 | \$0 | \$0 | \$1,500 |
| Contractual | \$0 | \$65,000 | \$6,000 | \$71,000 |
| Total | \$9,500 | \$71,875 | \$18,625 | \$100,000 |
| Grand Total | \$30,000 | \$225,000 | \$45,000 | \$300,000 |

2.c. Ability to Leverage: The City will leverage additional funds and resources to ensure project success. Per the attached letter, the City will commit \$103,473 in salary/benefits for the **Brownfields project director.** The City also expects to see a substantial return on the EPA's investment in the form of private capital investment and jobs created, given the City used past EPA Brownfields funds to leverage over \$86 million in capital and operating endowment investments and 176 full time jobs. The City also is making its own substantial capital investments in the RRRA. These investments include installing a \$90,000 water quality unit adjacent to the Reedy River and near the current Public Works Operations Center to mitigate pollutant particles flowing into the river and allocating more than \$573,000 for the RRRA Strategic/City Park Plans process. In addition to these investments, the City is preparing to invest more than \$39.4 million in the RRRA and City Park. Specifically, the City is relocating its Public Works Operations Center to make way for City Park—a \$25 million-plus endeavor. Once the new center is operational in December 2017, the City will invest \$3.5 million to demolish its facilities in the RRRA. An active Federal Emergency Management Agency (FEMA) Hazard Mitigation Grant in the amount of \$265,569 will support this demolition. Phase I of City Park is expected to begin in 2018 and cost \$10.9 million, which will be funded through a combination of federal, state, and local funds and private donations. The City's Phase I park investment alone, which is directly tied to a key project redevelopment strategy, would leverage more than \$36 for every dollar invested by the EPA.

3. Community Engagement and Partnerships

3.a. Engaging the Community

i) Community Involvement Plan: The City is adept at involving its citizens in municipal projects and planning activities and will capitalize on that expertise for this project. The momentum generated by recent planning efforts in the RRRA also will bolster community involvement for this project. For instance, the RRRA's Strategic/City Park planning initiative completed in 2016 used 18 community stakeholder meetings to solicit and incorporate feedback from more than 300 residents. Successes like this underscore the City's strong commitment to community engagement throughout this project and ability to implement a robust community involvement plan.

The community involvement plan aims to foster purposeful community participation across all age ranges. The City will convene a Brownfields Task Force (Task Force) comprised of the community stakeholders described in section 3.c.i. The Task Force will act in an advisory capacity and will: provide guidance on site prioritization, cleanup decisions, and reuse planning; assist with community activities and outreach materials; and act as the liaison between the project team and the community members they represent. To reach property owners, business organizations, developers and lenders, the City will present semi-annual project status updates and presentations to the Village of West Greenville and the West End Business Associations and at the City-hosted Quarterly Real Estate breakfast meetings. Public Lunch and Learn events at various locations throughout the RRRA will showcase successful brownfields redevelopment projects, resources available to address brownfields concerns, and provide project updates.

The City also plans to develop a brownfields lesson plan for Carolina High School students. The lesson plan will educate students (many of whom are from the RRRA) about brownfields' impacts on communities, remediation methods, and nearby repurposed properties. To extend educational opportunities to the broader public, the City is planning to host a series of educational pop-ups in conjunction with community stakeholders. The pop-ups will occur on or near popular repurposed brownfields throughout the RRRA and serve as a unique and interactive method for engaging new audiences—perhaps meaningfully connecting residents who may not have time to attend community meetings to the project. For example, as family members line-up as much as an hour before AJW Elementary afternoon dismissal, a pop-up at this former brownfield could share information about brownfields and redevelopment, and encourage project participation.

At RRRA Neighborhood Association meetings for Southernside (11/9/2017), West Greenville (11/14/2017), and the West End (11/7/2017) City staff informed attendees of this proposal.

ii) Communicating Progress: The City knows effective public engagement needs to include a variety of outlets. This promotes convenient and equal access to important project information regardless of whether a resident works third shift or a business owner cannot leave the store unattended. For this reason, the City will use communication methods that are intentionally wideranging and largely accessible at any time of day, like a Brownfields webpage, to promote accessibility and participation. Accordingly, when scheduling public meetings, the City will strive to schedule those meetings at a variety of times and locations to ensure greater accessibility. Past experience suggests good outlets for soliciting involvement from the RRRA's aging population are local churches, neighborhood meetings, and Task Force members who are well-respected community peers. Information dissemination, progress reports and solicitation of feedback will occur via: Task Force members; public and community group meetings; project brochures and website; brownfields lesson plans; educational pop-ups; newspaper articles in *The Greenville News*, *Greenville Journal* and *Greenville Magazine*; the Brownfields Lunch and Learn Series;

public notices; advertisements; monthly e-newsletter; and social media (via the City's Facebook page and Twitter account). According to 2011-2015 American Community Survey (ACS) Estimates, 92% of the RRRA population speaks English as a first language; therefore, it is not anticipated that a translator will be needed for community engagement activities. However, the City will provide one if necessary.

3.b. Partnerships with Government Agencies:

- i) Local/State/Tribal Environmental Authority: If ESAs uncover adverse contaminants SCDHEC Region 2 Public Health Office will assist with mitigating potential public health risks. The City maintains a strong relationship with SCDHEC's Upstate Environmental Affairs Regional office (the first point of contact in local environmental oversight structure) and will regularly consult with this office on priority properties as well as regulatory and cleanup standards. The City also collaborates with SCDHEC's Brownfields Program and hosted speakers from this office at a Lunch and Learn in 2016. Along with seeking technical guidance and consultation on properties potentially eligible for SCDHEC's Brownfields/Voluntary Cleanup Program & Revolving Loan Fund, the City will continue to work with the state Brownfields office on education efforts.
- ii) Other Governmental Partnerships: In 2010, the Army Corps of Engineers performed an initial assessment of the Reedy River's potential impacts on adjacent development and the need for open space. This relationship will inform future cleanup/redevelopment plans. The City also is working with the SC Emergency Management Division to demolish a portion of its Public Works Operations Center using a FEMA Hazard Mitigation Grant. Other federal and state agencies relevant to this project include: the U.S. Department of Housing and Urban Development (CDBG and HOME funds are used in the RRRA for property acquisition, residential development, and other neighborhood activities); and the SC Department of Transportation (coordination of streetscaping efforts tied to potential redevelopment along state-owned roads). The City also will work with the Greenville Housing Authority. They are currently renovating the Brookhaven affordable housing community in the RRRA and have future plans to build a 42-unit senior housing complex in the area which will support the area's affordable housing needs.

3.c. Partnerships with Community Organizations

i) Community Organization Descriptions & Roles: Committed project partners are listed below.

| Community Organization | Organization Description | Project Role |
|--------------------------------------|-------------------------------------|---|
| Carolina High School | Provides students with experiences | Task Force member, brownfields |
| Contact: Michael Delaney | that are academically excellent and | lesson plan development. |
| Phone: 864-355-2310 | socially equitable. | |
| Furman University's David E. Shi | Promotes study/practice of | Task Force member, host community |
| Center for Sustainability / Contact: | sustainability on campus and in | meetings. |
| Weston Dripp / Phone: 864-294-3392 | greater Greenville community. | |
| LiveWell Greenville | Public/private organizations making | Task Force member, provide |
| Contact: Sally Willis | Greenville County a healthier place | community learning activities |
| Phone: 864-230-6127 | to live/work. | (gardening and cooking demos). |
| Mill Community Ministries | Collection of social entrepreneurs | Task Force member, educational |
| Contact: Dan Weidenbenner | working to help under-resourced | workshops/pop-ups, facilitate project |
| Phone: 864-214-6709 | communities. | benefits (community gardens). |
| Soteria Community Development | Empowers low-income people. | Task Force member, spur job |
| Corporation / Contact: Jerry | Offers jobs in recycling service, | opportunities related to sustainability |
| Blassingame / Phone: 864-449-6684 | deconstruction, and salvage. | and brownfields redevelopment. |
| Southernside Neighborhoods in | Adopted master plan neighborhood | Task Force member, share |
| Action / Contact: Mary Duckett | in RRRA. A low to moderate | Information, and encourage residents |

| Community Organization | Organization Description | Project Role |
|---|------------------------------------|-------------------------------------|
| Phone: 864-235-5785 | income community (per HUD). | to participate in project. |
| Sunbelt Human Advancement | Provides programs that help low- | Task Force member, help facilitate |
| Resources (SHARE) / Contact: | income residents become self- | new job opportunities. |
| Bruce Forbes / Phone: 864-269-0700 | sufficient. | |
| Upstate Forever / Contact: Heather | Promotes sensible growth, protects | Task Force member, provide |
| Nix / Phone: 864-250-0500, ext. 25 | special places in Upstate region. | community education, host meetings. |

The City plans to work with other organizations located in or serving the RRRA including: AJW Elementary, Hampton-Pinkney Historic District, Lake Conestee Nature Park, the Kroc Center, and the West End and West Greenville Neighborhood Associations on additional outreach efforts.

ii) Letters of Commitment: Letters from organizations listed in the table above are attached.

3.d. Partnerships with Workforce Development Programs: Soteria Community Development Corporation and SHARE will help connect RRRA residents to job opportunities associated with assessment, cleanup, or redevelopment. Soteria's GreenStart program provides transitional job opportunities in the deconstruction and reclamation sectors to people facing significant obstacles to employment. SHARE's Lifelong Advancement through Diligence, Determination, and Employment Resources Program provides comprehensive jobs training/improvement and placement. The City will keep these partners and other workforce development programs, like the Greenville County Workforce Development Board, apprised of employment needs connected to this project. The City also will encourage project consultants to contact these agencies for employment needs and to work with local businesses when practical. No local entities are Brownfields Job Training grantees.

4. Project Benefits

4.a. Welfare, Environmental, and Public Health Benefits: With funding from the EPA's Brownfields Assessment program, the City will assess priority brownfield properties in the RRRA as a building block for the area's renaissance. Since these blighted and vacant properties pose many risks to the community's overall wellbeing, the City anticipates assessing the properties—thereby preparing them for the equitable development purposes envisioned by the RRRA's planning initiatives (the West Side Comprehensive Plan (WSCP) and Strategic/City Park plans, referenced in section 2.a.i)—will alleviate or reverse some of the area's longstanding welfare, environmental, and public health issues.

Key community welfare challenges this project will mitigate include low access to healthy, affordable food and difficulty accessing community amenities. For example, community planning efforts call for a marketplace in old warehouses adjacent to the Swamp Rabbit Trail (SRT) as well as community gardens and urban agriculture in City Park to make food more accessible. New trail spurs and sidewalks will give children and adults safe access to anchor institutions, like the Kroc Center, the SRT, and, eventually, City Park. Other benefits include enabling the development of new educational facilities to tackle the area's poor educational attainment (31.6% of the population lacks a high school diploma) and, over time, the elimination of abandoned properties (likely hot spots for crime) could help reduce the prevalence of crime in the RRRA's West Greenville neighborhood. Given the city's severe shortage of affordable rental housing described in section 1.b.i, clearing property in the RRRA for new affordable housing is integral to addressing this citywide problem as well as providing the area's large renter population (73%) with quality housing. Opportunities for quality housing also will help alleviate adverse housing

conditions, like overcrowding and high housing costs, identified in Bon Secours' CHNA and linked to poor social determinants of health.

This project will facilitate the creation of City Park, anticipated to be one of the city's largest and most active green spaces, and other development throughout the RRRA. The environmental benefits that go hand-in-hand with green space and infill development are numerous. Upon its completion, City Park is expected to achieve Sustainable SITES Initiative certification meaning its roughly 60 acres will reduce water demand, filter and reduce stormwater runoff, provide wildlife habitat, reduce energy consumption, and improve air quality. The park will be built to withstand flooding from the Reedy River and, by creating more open space along the river, assist with flood mitigation and resiliency. Repurposing the RRRA's brownfields also supports infill development and the use of existing road, electrical, sewer, and water infrastructure; facilitates new opportunities to introduce clean energy and water efficiency improvements in future developments; and creates opportunities to work with community partners like Soteria to recycle construction and demolition materials and connect area residents to jobs.

Public health benefits associated with this project entail divesting priority properties of chemical stressors, especially as they may be harboring dangerous environmental contaminants. For example, the area's 1.459-acre site formerly known as the Smart Supply Warehouse (assessed and cleaned up with funding funneled from FEMA through the state's Department of Natural Resources Severe Repetitive Loss Program and an EPA Brownfields Hazardous Cleanup grant) was contaminated with lead, arsenic, and polycyclic aromatic hydrocarbons. This once toxic property is now part of the Kroc Center campus. While the extent of potential hazardous substances and petroleum contamination on other RRRA brownfields sites is unknown, if any match the Smart property's level of contamination, the negative impacts on the area's sensitive populations, just as with the welfare challenges described above, may be considered a sensitive population, especially as nearly two out of three households are low-income (per 2011-2015 ACS Census Estimates). Conducting ESAs will help determine the extent of contamination, establish the actions needed to mitigate public health risks, and encourage new development.

4.b. Economic and Community Benefits: The WSCP, completed in 2014, and the RRRA/City Park planning documents, completed in 2016, all produced a similar vision for the RRRA—a resilient and vibrant community where mixed-income renters and homeowners live, community and recreational interests are abundant, and neighborhood-based businesses meet many of the residents' daily needs in addition to providing more job opportunities. Redevelopment in this area, which must begin with ESAs due to the area's infamous textile heritage, will make significant strides towards achieving this vision as well as positively affecting the lives of its disadvantaged residents. Given the RRRA's high unemployment rate of 11.4%, one way residents will benefit economically from repurposed brownfields is improved access to living wage jobs and new employment opportunities offered through new development like a high-tech job center/business accelerator space envisioned in the WSCP. Mitigating brownfields and fostering redevelopment also will help increase the RRRA's low business license numbers detailed in section 1.c.ii. As revitalization continues, business, residential, and recreational uses also will help inflate low property values. Though home values in the RRRA currently average more than \$122,000 below the rest of the city, 2011-2015 ACS Estimates reveal RRRA property values are increasing as redevelopment occurs. For example, the value of owner-occupied residences located within the RRRA's Census Tract 9 increased 159.3% since the 2000 Census (when the City

received its first EPA Brownfields grant). Property values in Census Tracts 7 and 8 also increased at 83.6% and 47.8%, respectively. As more brownfield properties are mitigated, this upward trend is expected to continue and help align the RRRA's property values with the rest of the city. As property values increase, the City also expects the area's 14.9% vacant home rate will drop and to spend fewer resources on demolition in the area. The area also is realizing economic benefits from previous brownfields redevelopments and EPA investments—a 2012 Return on Investment document reports an EPA investment of \$320,445 across five RRRA properties yielded \$60 million in capital investment and 176 full-time jobs.

With the impending removal of the City's Public Works Operation Center, the future development of City Park is imminent which, in addition to the environmental benefits discussed in section 4.a, will deliver other community benefits. It will connect the RRRA's neighborhoods to the SRT and the City's extensive trail network. City Park also will significantly increase RRRA's residents' access to green space, the scarcity of which is a non-chemical stressor linked to the area's brownfields. By increasing the area's park acreage nearly six-fold over its present 10.8 acres, residents will have more opportunities for exercise and recreation to offset obesity and sedentary rates. ESAs will determine if the properties within and adjacent to the park's proposed footprint pose any environmental risks that require mitigation prior to construction. As environmental concerns are remediated, idle brownfields will become prime space for the redevelopment goals envisioned during this project as well as in recent community planning efforts.

5. Programmatic Capability and Past Performance

5.a. Audit Findings: The City has received an unmodified opinion on its full financial statements every year. The City's OMB Circular A-133 audit for fiscal year ended June 30, 2015 had a material weakness (completely unrelated to *any* City grant expenditures) in internal control resulting from a development agreement and recording capital assets and related long-term obligations. For fiscal years ended June 30, 2016 and June 30, 2017, no material weakness were identified. In June 2012, the City was randomly selected for an EPA Limited Scope review and was found to have used adequate systems and procedures for its FY09 award.

5.b. Programmatic Capability: The City has extensive experience managing EPA Brownfields funding and other federal, state, and local grants. Monique Mattison will serve as the project director. She began her career with the City in 2016 as a neighborhood planner before being promoted to community planner in 2017. She will be overseen and assisted by Ginny Stroud, the Community Development Administrator. Ms. Stroud has overseen the City's Brownfields Program since its inception in 2000. Ms. Mattison and Ms. Stroud are extremely skilled in federal grant management (including managing the City's allocations from HUD's CDBG and HOME programs), planning, community outreach, and managing consultants—all skills that directly translate to meeting this project's technical, administrative, and financial requirements.

To enhance programmatic and administrative project capacity, Ms. Mattison and Ms. Stroud will lead an interdepartmental project team comprised of staff from: the Community Development Division, Parks & Recreation, Public Information & Events, Public Works' Environmental Engineering Division, Finance, and the City Attorney's office. The City also will hire an experienced brownfields consultant to assist with the project. A comprehensive work plan and master schedule will guide the project's execution according to the grant's terms and conditions and will identify deadlines, responsible party for each activity, and set project team meetings.

5.c. Measuring Environmental Results: Anticipated Outputs/Outcomes: City staff will maintain control of ACRES reporting to closely monitor and report project progress. All project-related materials, ranging from sign-in sheets to consultant reports, will be electronically maintained and stored on City network space to track outputs, like number of residents involved or number of Phase I ESAs completed, and to facilitate communication with the project team and EPA project manager. The EPA project manager will be invited to participate in project team meetings (via conference call) as needed to evaluate progress and provide troubleshooting. To measure outcomes beyond the 3-year grant period, like redevelopment activities, the City will use Return on Investment documents, internal systems, such as budget and business license data, and Census data to examine area investments, jobs created, and growth in business activity and property values.

5.d. Past Performance and Accomplishments:

- **i, 1-2)** Currently or Has Ever Received an EPA Brownfields Grant: The City has closed five Brownfields grants. To conserve space, for each project all Quarterly progress reports, MBE/WBE Utilization Forms, Annual Financial Status Reports, Key Measures Forms, and Project Closeout Reports were completed on time and in compliance with terms and conditions. Accomplishments were reported in ACRES and each project closed with \$0.00 in remaining funds.
- 1) EPA Brownfields Assessment Demonstration Pilot Grant (Year Awarded: 2000, Amount: \$200,000) Accomplishments: 1) 50 potential brownfield sites identified, 2) 27 inquiries from property owners/29 inquiries from potential buyers received, 3) 7 Phase I and 1 Phase II ESAs completed, 4) 9 sites assessed with leveraged funds, 5) 23 partnerships formed to address brownfields, 6) 4 brownfield agreements initiated, 7) \$262,000 leveraged to address environmental issues, 8) 11 cleanup/construction jobs created.
- 2) EPA Brownfields Hazardous Assessment Grant (Year Awarded: 2006, Amount: \$200,000) Accomplishments: 1) 4 Phase I /3 Phase II ESAs completed, 2) \$58,400 leveraged to address environmental issues, 3) created informational website, 4) published project brochure.
- 3) EPA Brownfields Community-Wide Hazardous/Petroleum Assessment Grant (Year Awarded: 2009, Amount: \$400,000) Accomplishments: 1) 16 Phase I and 3 Phase II ESAs completed, 2) \$486,500 leveraged City funds, 3) updated website, 4) published brochure, 5) published Return on Investment study of City brownfield projects for use as redevelopment tool, 6) \$23 million in redevelopment funds leveraged for AJW Elementary.
- 4) EPA Brownfields Hazardous Cleanup Grant (Year Awarded: 2009, Amount: \$200,000)

 Accomplishments: 1) Corrective measures, including a Stormwater Pollution Prevention Plan, completed in accordance with approved Corrective Measurements Plan and Non-Responsible Party Voluntary Cleanup Contract, 2) \$326,000 leveraged to address environmental issues, 3) \$67 million in redevelopment funds leveraged for the construction/operations of the Kroc Center.
- 5) EPA Brownfields Community-Wide Hazardous/Petroleum Assessment Grant (Year Awarded: 2014, Amount: \$400,000) Accomplishments: 1) New partnerships with local schools (worked with Carolina High Environmental Science classes) and development community created, 2) Hosted 3 Lunch and Learns (Highlights: Environmental Justice and Developer-specific), 3) Launched enewsletter and grew readership to 1,580 people.
- 5.d.ii) and 5.d.iii) Not applicable.

Threshold Criteria Documentation for Community-Wide Assessment Grants

1. Applicant Eligibility

The City of Greenville is a General Purpose Unit of Local Government as that term is defined under 2 CFR 200.64.

2. Community Involvement

The City of Greenville is committed to informing and involving the community and a wide range of stakeholders throughout the three-year grant period. City staff members have already made an explicit effort to discuss this grant opportunity and the City's intent to apply for it with the target community, the Reedy River Redevelopment Area (RRRA). Information on the application and the City's brownfields program was shared at three recent neighborhood association meetings within the RRRA—Southernside on November 9, 2017, the West End on November 7, 2017, and West Greenville on November 14, 2017.

This early push to involve the community is indicative of the City's commitment to community and stakeholder engagement throughout the entire three-year grant period. As further detailed in the narrative proposal on pages 8, 10, 11, and 12 a wide range of outreach and involvement activities will be performed to ensure the needs and expectations of residents and community stakeholders are fully factored into the project. These activities include, but are not limited to, holding meetings with local residents, distributing project updates through e-newsletters and social media outlets, and administering a brownfields lesson plan that will educate high school students about brownfields. The City also is excited to introduce a new outreach tactic through this project—educational pop-ups. The City envisions these pop-ups occurring on or near repurposed brownfields, such as sections of the popular Swamp Rabbit Trail or on the campus of A.J. Whittenberg Elementary, to educate passers-by about brownfields and the benefits to the community when they are repurposed as well as to encourage involvement in the project. An advisory board, called the Brownfields Task Force, and comprised of target area residents and stakeholders, will be convened to help direct project decisions ranging from site prioritization to redevelopment plans, as well as assist with community involvement and outreach. Furthermore, eight different community organizations, with direct ties to the Reedy River Redevelopment Area and its revitalization, will be involved in this project.

The City of Greenville has extensive experience executing comprehensive outreach campaigns, particularly in regards to brownfields, as evidenced by its successful completion of the following five different Environmental Protection Agency (EPA) grant projects: a Brownfields Assessment Demonstration Pilot project awarded in 2000, a Brownfields Community-Wide Hazardous Assessment project awarded in 2006, a Brownfields Hazardous Cleanup grant awarded in 2009, a Brownfields Community-Wide Hazardous/Petroleum Assessment grant awarded in 2009, and a Brownfields Community-Wide Hazardous/Petroleum Assessment grant awarded in 2014.

This application is for a community-wide assessment grant; therefore, no site-specific property information is required.

SF-424 Question 14: Areas Affected by Project (Cities, Counties, States, etc.)

The areas affected by this project are the City and County of Greenville, South Carolina.

OMB Number: 4040-0004 Expiration Date: 10/31/2019

| Application for I | Federal Assista | nce SF | -424 | | | | | | |
|-------------------------|-----------------------|-----------|----------------------|--------|------------------------|----------------|----------|---|--|
| * 1. Type of Submissi | ion: | * 2. Typ | | * If R | evision, select approp | oriate letter(| s): | | |
| Application | | C | ontinuation | * Oth | ner (Specify): | | | | |
| Changed/Corre | ected Application | Re | evision | | | | | | |
| * 3. Date Received: | | 4. Appli | cant Identifier: | | | | | | |
| 11/14/2017 | | | | | | | | | |
| 5a. Federal Entity Ide | entifier: | | | 5b | b. Federal Award Ide | entifier: | | | |
| | | | | | | | | | |
| State Use Only: | | | | | | | | | |
| 6. Date Received by | State: | | 7. State Application | Ident | tifier: | | | | |
| 8. APPLICANT INFO | ORMATION: | | | | | | | | |
| * a. Legal Name: | ity of Greenvi | lle | | | | | | | |
| * b. Employer/Taxpay | er Identification Nur | mber (EIN | N/TIN): | * (| c. Organizational DU | JNS: | | | |
| 57-6000236 | | | | 0 | 703727270000 | | | | |
| d. Address: | | | | | | | | | |
| * Street1: | 206 South Mai | n Stre | et | | | | | | |
| Street2: | | | | | | | 1 | | |
| * City: | Greenville | | | | | | | | |
| County/Parish: | | | | | | | | | |
| * State: Province: | | | | | SC: South Car | olina | | | |
| * Country: | | | | | USA: UNITED S | TATES | | | |
| * Zip / Postal Code: | 29601-2832 | | | | 0311 0111120 0 | | | | |
| e. Organizational U | nit: | | | | | | | | |
| Department Name: | | | | Di | ivision Name: | | | | |
| Economic Develo | opment | | | С | ommunity Devel | .opment | | | |
| f. Name and contac | ct information of p | erson to | be contacted on m | atter | rs involving this ap | plication: | | | |
| Prefix: Ms. | | | * First Name | e: | Monique | | | | |
| Middle Name: | | | | | | | | | |
| * Last Name: Mat | tison | | | | | | | | |
| Suffix: | | | | | | | | | |
| Title: Community | Planner | | | | | | | | |
| Organizational Affiliat | tion: | | | | | | | _ | |
| City of Greenv | ille | | | | | | | | |
| * Telephone Number: | 864-467-4574 | : | | | Fax Numb | er: 864- | 467-5735 | | |
| * Email: mmattisc | on@greenvilles | c.gov | | | | | | | |

| Application for Federal Assistance SF-424 |
|--|
| * 9. Type of Applicant 1: Select Applicant Type: |
| C: City or Township Government |
| Type of Applicant 2: Select Applicant Type: |
| |
| Type of Applicant 3: Select Applicant Type: |
| |
| * Other (specify): |
| |
| * 10. Name of Federal Agency: |
| Environmental Protection Agency |
| 11. Catalog of Federal Domestic Assistance Number: |
| 66.818 |
| CFDA Title: |
| Brownfields Assessment and Cleanup Cooperative Agreements |
| * 12. Funding Opportunity Number: |
| EPA-OLEM-OBLR-17-07 |
| * Title: |
| FY18 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS |
| |
| |
| |
| 13. Competition Identification Number: |
| |
| Title: |
| |
| |
| |
| 14. Areas Affected by Project (Cities, Counties, States, etc.): |
| 1235-GreenvilleSC_AreasAffectedByProject.pd Add Attachment Delete Attachment View Attachment |
| |
| * 15. Descriptive Title of Applicant's Project: |
| Brownfields Hazardous/Petroleum Community-Wide Assessment for the City of Greenville's Reedy River Redevelopment Area. |
| |
| Attach supporting documents as specified in agency instructions. |
| Add Attachments Delete Attachments View Attachments |
| |

| Т | or Federal Assistance SF-424 | | |
|--|--|--|--|
| 16. Congressio | nal Districts Of: | | |
| * a. Applicant | SC-004 | * b. Program/Project SC-004 | |
| Attach an addition | nal list of Program/Project Congressional Dis | tricts if needed. | |
| | | Add Attachment Delete Attachment View Attachment | |
| 17. Proposed P | roject: | | |
| * a. Start Date: | 10/01/2018 | * b. End Date: 09/30/2021 | |
| 18. Estimated F | unding (\$): | | |
| * a. Federal | 300,000.0 | 00 | |
| * b. Applicant | 0.0 | | |
| * c. State | 0.0 | | |
| * d. Local | 0.0 | | |
| * e. Other | 0.0 | | |
| * f. Program Inco | ome 0.0 | | |
| * g. TOTAL | 300,000.0 | 00 | |
| * 19. Is Applicat | tion Subject to Review By State Under E | xecutive Order 12372 Process? | |
| a. This appl | ication was made available to the State u | nder the Executive Order 12372 Process for review on 09/30/2018. | |
| b. Program | is subject to E.O. 12372 but has not been | selected by the State for review. | |
| c. Program | is not covered by E.O. 12372. | | |
| * 20. Is the App | licant Delinquent On Any Federal Debt? | (If "Yes," provide explanation in attachment.) | |
| ☐ Yes ☐ No | | | |
| Yes | ⊠ No | | |
| | ⊠ No e explanation and attach | | |
| | | Add Attachment Delete Attachment View Attachment | |
| If "Yes", provide 21. *By signing herein are true comply with an subject me to c | this application, I certify (1) to the state, complete and accurate to the best of y resulting terms if I accept an award. I a riminal, civil, or administrative penalties | ements contained in the list of certifications** and (2) that the statements may knowledge. I also provide the required assurances** and agree to may aware that any false, fictitious, or fraudulent statements or claims may | |
| If "Yes", provide 21. *By signing herein are true comply with an subject me to c ** I AGREE ** The list of cer | this application, I certify (1) to the state, complete and accurate to the best of y resulting terms if I accept an award. I a riminal, civil, or administrative penalties tifications and assurances, or an internet sins. | ements contained in the list of certifications** and (2) that the statements in my knowledge. I also provide the required assurances** and agree to am aware that any false, fictitious, or fraudulent statements or claims may an example. (U.S. Code, Title 218, Section 1001) | |
| If "Yes", provided 21. *By signing herein are true comply with an subject me to comply with an authorized me to comply with a comply wi | e explanation and attach this application, I certify (1) to the state, complete and accurate to the best of y resulting terms if I accept an award. I a riminal, civil, or administrative penalties etifications and assurances, or an internet sens. | ements contained in the list of certifications** and (2) that the statements in my knowledge. I also provide the required assurances** and agree to am aware that any false, fictitious, or fraudulent statements or claims may an example. (U.S. Code, Title 218, Section 1001) | |
| If "Yes", provide 21. *By signing herein are true comply with an subject me to c ** I AGREE ** The list of cer specific instruction Authorized Rep | this application, I certify (1) to the state, complete and accurate to the best of y resulting terms if I accept an award. I a riminal, civil, or administrative penalties rifications and assurances, or an internet sens. | ements contained in the list of certifications** and (2) that the statements from the way in the management of the manag | |
| If "Yes", provide 21. *By signing herein are true comply with an subject me to c ** I AGREE ** The list of cer specific instructio Authorized Rep Prefix: Middle Name: | e explanation and attach this application, I certify (1) to the state, complete and accurate to the best of y resulting terms if I accept an award. I a riminal, civil, or administrative penalties trifications and assurances, or an internet sons. | ements contained in the list of certifications** and (2) that the statements from the way in the management of the manag | |
| If "Yes", provide 21. *By signing herein are true comply with an subject me to c ** I AGREE ** The list of cer specific instructio Authorized Rep Prefix: Middle Name: | this application, I certify (1) to the state, complete and accurate to the best of y resulting terms if I accept an award. I ariminal, civil, or administrative penalties riffications and assurances, or an internet sens. | ements contained in the list of certifications** and (2) that the statements from the way in the management of the manag | |
| If "Yes", provide 21. *By signing herein are true comply with an subject me to c ** I AGREE ** The list of cer specific instructio Authorized Rep Prefix: Middle Name: * Last Name: Suffix: | this application, I certify (1) to the state, complete and accurate to the best of y resulting terms if I accept an award. I ariminal, civil, or administrative penalties riffications and assurances, or an internet sens. | ements contained in the list of certifications** and (2) that the statements from the way in the management of the manag | |
| If "Yes", provide 21. *By signing herein are true comply with an subject me to c ** I AGREE ** The list of cer specific instructio Authorized Rep Prefix: Middle Name: * Last Name: Suffix: * Title: Cit | this application, I certify (1) to the state, complete and accurate to the best of y resulting terms if I accept an award. I a riminal, civil, or administrative penalties retifications and assurances, or an internet sens. | ements contained in the list of certifications** and (2) that the statements from the way in the management of the manag | |
| If "Yes", provide 21. *By signing herein are true comply with an subject me to c ** I AGREE ** The list of cer specific instruction Authorized Rep Prefix: Middle Name: * Last Name: Suffix: * Title: Cit * Telephone Num | this application, I certify (1) to the state, complete and accurate to the best of y resulting terms if I accept an award. I a riminal, civil, or administrative penalties tifications and assurances, or an internet sins. | ements contained in the list of certifications** and (2) that the statements in my knowledge. I also provide the required assurances** and agree to a may aware that any false, fictitious, or fraudulent statements or claims may and it. (U.S. Code, Title 218, Section 1001) It where you may obtain this list, is contained in the announcement or agency First Name: John | |